

Summary of the Meeting with Lenox China, 1/25/89

A meeting with EPA, NJDEP, and Lenox China was held on January 25, 1989 in Trenton, New Jersey. The following is a summary of the meeting:

- ° Lenox China proposed its remedial program for the TCE plume. The proposed remedial program includes pumping and treat of the contaminated ground water, the treatment will consist of air stripping. The treated ground water will be discharged through the discharge point permitted under the NJPDES/DSW. Three pumping wells will be utilized for pumping and a surface water discharge limit for TCE is 50 ppb.
- ° Lenox China concluded, based on the results of the investigations and their past operation practices, that source of the TCE plume is the RCRA drum storage area. Therefore, the TCE plume will be cleaned up under the State-delegated RCRA program.
- ° Lenox China will begin permitting process for a DSW permit and an air emission permit.
- ° NJDEP's determination as to whether closure-in-place of Slip Basin would be allowed will be made within three weeks of the date of the meeting. The unit is sitting on the water table and the NJDEP regulations require at a minimum five-foot clearance between bottom of a unit and a seasonal high water table. During the meeting, NJDEP strongly objected the option of closure in place.
- ° Degreaser Pit - RCRA status of this unit will be made shortly. Lenox believes that the unit is not regulated but NJDEP claimed the unit was included in the original Part A application. Lenox China will get back to NJDEP on the status of the unit, that is, the unit has ever used for storing hazardous waste for more than 90 days.
- ° Lenox China will send a letter to EPA during the week of January 30 1989, updating the status of the SWMUs. EPA and Lenox agreed to have a meeting during the second or the third week of February to discuss what requirements would be included in the HSWA Permit.
- ° NJDEP's post-closure permit, expected to be issued jointly with the HSWA Permit, would include ground water monitoring for Slip Basin and post-closure monitoring for Glaze Basin.



C489 - 5/30/89

Roxanne Jayne, an attorney hired by Lenox called to discuss remediation of the site. She said that although a post-closure permit would not be issued soon, the company wants to begin remediation. I told her that EPA could require corrective action under a 3008(h) order or DEP could require remediation under their Water authority. A voluntary cleanup could also be possible under certain circumstances. She said that she would consider what I told her and Lenox would possibly submit a plan for cleanup.

B.T.

5/30/89

Roxanne Jayne, an attorney hired by Lenox called to discuss remediation of the site. She said that although a post-closure permit would not be issued soon, the company wants to begin remediation. I told her that EPA could require corrective action under a 3008(h) order or DEP could require remediation under their Water authority. A voluntary cleanup could also be possible under certain circumstances. She said that she would consider what I told her and Lenox would possibly submit a plan for cleanup.

B.T.

7/21/89

Discussion with Louis Fantin, Lenox, (609) 896-2800 ext. 428 on Corrective Action

EPA had been compiling the HSWA permit for Lenox which we intended to issue with the NJDEP post-closure permit. The PC permit was delayed due to a determination by DEP that the proposed closure scenario was unacceptable, therefore the HSWA permit could not be issued. Lenox however, wants to begin corrective action and would like an enforceable method to do that.

I suggested that since EPA funded DEP to issue a NJPDES permit addressing corrective action (this has until now been a missed commitment) that the NJPDES permit currently being negotiated with Lenox for the containment and cleanup of the TCE plume also be the vehicle for requiring the RFI investigation and subsequent cleanup. This was agreeable to Tracy Wagner, the DEP supervisor, and I then informed Mr. Fantin of this. Once the closure issue is resolve and the PC permit drafted, the HSWA permit will include the advanced stage of corrective action reflected in the NJPDES permit. Andy P. will be involved in the initial meetings between Lenox, EPA and DEP to assure that at least all of the requirements that would have been included in the HSWA permit will be addressed in the DEP permit.

We will forward the RFA to Lenox. They will review it and then arrange a meeting with EPA and DEP.

B.T.

cc: Andy P.
Andy B.

ENVIRONMENTAL PROTECTION
AGENCY REG II

93 SEP -1 PM 1:06

AWM-HAZ WASTE FAC. BRANCH



State of New Jersey

Department of Environmental Protection and Energy

Division of Responsible Party Site Remediation

CN 028

Trenton, NJ 08625-0028

ENVIRONMENTAL PROTECTION
AGENCY REG II

93 AUG 18 AM 11:20

AWM-HAZ WASTE FAC. BRANCH

Karl J. Delaney
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P 261 028 826

CA93 - AUG 27 1993

Mr. Stephen F. Lichtenstein
Lenox Inc.
Lawrenceville, N.J. 08648-2394

Dear Mr. Lichtenstein:

Re: **Lenox China - Pomona**
Galloway Township, Atlantic County
NJDEPE and USEPA Coordination and Sign-off for Correspondence


In December 1992, the New Jersey Department of Environmental Protection and Energy (Department) and the U.S. Environmental Protection Agency (EPA) jointly issued a New Jersey Pollutant Discharge Elimination System (NJPDES) permit and Hazardous and Solid Waste Amendments (HSWA) permit respectively for the Lenox China facility located in Pomona, New Jersey. These permits are for the investigation and remediation, if determined necessary, for the above referenced facility. Since the time of issuance, the RFI work plan was reviewed and the regulatory agencies are awaiting a revised RFI work plan which incorporates all of the comments articulated in the joint letter issued on June 7, 1993 and the agreements reached in the July 12, 1993 meeting held in Trenton, New Jersey.

The EPA is responsible for implementing HSWA. The provisions of HSWA include corrective action, land disposal restrictions, waste minimization, and the toxicity characteristic rule.

The Department is the lead agency to oversee the performance and compliance of corrective action activities to be performed in accordance with both the NJPDES and EPA HSWA permits. You will receive a final response letter for all correspondence related to NJPDES and HSWA corrective action requirements from the Bureau of Federal Case Management (BFCM) of the NJDEPE, which is to be signed by Mr. Frank Faranca as the case manager. Any differences between EPA HSWA permit and State NJPDES permit requirements will be resolved between the Agencies before comments are sent to you. Any documents submitted to Mr. Faranca must also be submitted to Andrew Park of EPA, who will forward EPA's comments to the BFCM.

If you have any questions, please contact Frank F. Faranca at (609) 633-1455 or Andy Park at (212) 264-8684.

Sincerely yours,



Bruce Venner, Bureau Chief
Bureau of Federal Case Management
NJDEPE



Andrew Bellina, P.E.
Chief, Hazardous Waste Facilities Branch
USEPA, Region II

FFF

c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEPE/DPFSR/BGWPA
John Kinkela, Lenox China, Pomona Facility



State of New Jersey
Department of Environmental Protection and Energy
 Division of Responsible Party Site Remediation
 CN 028
 Trenton, NJ 08625-0028

ENVIRONMENTAL PROTECTION
 AGENCY REG II
 93 SEP 24 AM 12:20
 SWM-HAZ WASTE FAC. BRANCH

Scott A. Weiner
 Commissioner

Karl J. Delaney
 Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
 NO. PA261 030 891

Mr. Stephen F. Lichtenstein
 Lenox Inc.
 Lawrenceville, N.J. 08648-2394

CA93 - SEP 20 1993

Dear Mr. Lichtenstein:

Re: **Lenox China - Pomona**
Chemical Constituents Inventory ("Inventory")
Galloway Township, Atlantic County

The New Jersey Department of Environmental Protection and Energy (Department) and the United States Environmental Protection Agency (EPA) have reviewed the above referenced Inventory prepared by Lenox China (Lenox) and received on August 26, 1993. The Department and EPA have determined that the Inventory has adequately characterized all of the raw materials used in the past and/or currently being used at the Lenox China facility in Pomona, New Jersey.

Based upon the information described in this inventory, the Department and EPA believe that sufficient data exist to adequately measure the impact on ground water and soil of all of the major and minor raw materials listed in the inventory with the exception of lead, zinc and TCE. Additional ground water and soil sampling beyond that already in the Permits and the RFI Work Plan shall not be required. Should additional information become available regarding past disposal practices, Lenox must inform the regulatory agencies, the Chemical Constituents Inventory must be revised, and the list of analytical parameters for sampling reevaluated accordingly.

If you have any questions, please contact me at (609) 633-1455.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Faranca".

Frank Faranca, Project Manager
Bureau of Federal Case Management

Enclosure

FFF

c: Andrew Park, USEPA, Region II
Daryl Clark, NJDEPE/DPFSR/BGWPA
John Evenson, NJDEPE/DPFSR/BEMQA
John Kinkela, Lenox China, Pomona Facility